

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,
MARY BLY, MICHAEL CONNELLY,
SYLVIA DAY, JONATHAN FRANZEN,
JOHN GRISHAM, ELIN HILDERBRAND,
CHRISTINA BAKER KLINE, MAYA
SHANBHAG LANG, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA
ROBINSON, GEORGE SAUNDERS, SCOTT
TUROW, and RACHEL VAIL, individually
and on behalf of others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC,
OPENAI GP LLC, OPENAI, LLC, OPENAI
GLOBAL LLC, OAI CORPORATION LLC,
OPENAI HOLDINGS LLC, OPENAI
STARTUP FUND I LP, OPENAI STARTUP
FUND GP I LLC, OPENAI STARTUP FUND
MANAGEMENT LLC, and MICROSOFT
CORPORATION,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR
BRANCH, RICH COHEN, EUGENE
LINDEN, DANIEL OKRENT, JULIAN
SANCTON, HAMPTON SIDES, STACY
SCHIFF, JAMES SHAPIRO, JIA
TOLENTINO, and SIMON WINCHESTER, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI OPCO LLC,
OPENAI GP, LLC, OPENAI GLOBAL LLC,
OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC, OPENAI STARTUP FUND
I LP, OPENAI STARTUP FUND GP I LLC,

Consolidated Cases:

Case No. 1:23-cv-08292-SHS

Case No. 1:23-cv-10211-SHS

Case No. 1:24-cv-00084-SHS

**AFFIDAVIT OF CARRIE A. BEYER
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

OPENAI STARTUP FUND MANAGEMENT
LLC, and MICROSOFT CORPORATION,

Defendants.

NICHOLAS A. BASBANES and NICHOLAS
NGAGOYEANES (professionally known as
Nicholas Gage), individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI,
INC., OPENAI GP, L.L.C., OPENAI
HOLDINGS, LLC, OAI CORPORATION,
LLC, OPENAI GLOBAL, LLC, OPENAI,
L.L.C., and OPENAI OPCO, LLC,

Defendants.

STATE OF ILLINOIS)
) ss:
COUNTY OF COOK)

Carrie A. Beyer, of full age, being duly sworn, hereby deposes and says as follows:

1. I am a Partner with the law firm of Faegre Drinker Biddle & Reath LLP, attorneys
for defendant Microsoft Corporation in the above-captioned actions.

2. I am admitted to practice in the highest court of the State of Illinois. I am a
member in good standing of the highest court of the State of Illinois. Annexed hereto as Exhibit
A is a Certificate of Good Standing from the Supreme Court of Illinois, dated June 21, 2024.

3. I have never been convicted of a felony.

4. I have never been censured, suspended, disbarred or denied admission or
readmission by any court.

5. There are no pending disciplinary proceedings against me in any state or federal court.

Carrie Beyer

Carrie A. Beyer

Sworn and subscribed to before
me this 8 day of July, 2024

Patricia Guevara

Notary Public

